

**STATEMENT OF BASIS (AI No. 40421)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0091405 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** ABC Bait Company, Inc.  
Post Office Box 627  
Amelia, Louisiana 70340

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** December 21, 2006

**1. PERMIT STATUS**

**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. NPDES permit - (LA0091405)**  
NPDES permit effective date: N/A  
NPDES permit expiration date: N/A

**C. LWDPs permit - (WP3905)**  
LWDPs permit effective date: June 7, 1993  
LWDPs permit expiration date: June 6, 1998

**D. LPDES permit - (LA0091405)**  
LPDES permit effective date : November 1, 1999  
LPDES permit expiration date: October 31, 2004

**E. Date Application Received:** July 1, 2004

**2. FACILITY INFORMATION**

**A. FACILITY TYPE/ACTIVITY - bait fish processing facility**

Menhaden bait fish are transferred from fishing vessels and quick frozen in large refrigerated fish tanks containing brine water (purchased from Texas Brine Company). The frozen bait fish are then removed from the fish tank by a conveyor belt system and packaged for shipment for the commercial crab, crawfish, and catfish industries. The harvesting time lasts from April to October with April, May, and June being the peak months, and the facility processes approximately 100,000 lbs/day.

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**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: II
4. SIC code: 0912

**C. LOCATION** - 9006 Highway 182 East, Amelia, St. Mary Parish  
Latitude 29°41'06", Longitude 91°08'55"

**3. OUTFALL INFORMATION**

Outfall 001

Discharge Type: bail water, brine tank overflow, washdown water, and  
compressor cooling water  
Treatment: none  
Location: at the point of discharge from the drain located on the  
east side of the facility (Latitude 29°41'06", Longitude  
91°08'55")  
Flow: 250 gpd  
Discharge Route: directly into Bayou Boeuf

Outfall 002

Discharge Type: bail water, brine tank overflow, and washdown water  
Treatment: none  
Location: at the point of discharge from the drain located on the  
west side of the facility (Latitude 29°41'06", Longitude  
91°08'55")  
Flow: 250 gpd  
Discharge Route: directly into Bayou Boeuf

Outfall 003

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant  
Location: at the point of discharge from the sewage treatment  
plant located on the east side of the facility  
(Latitude 29°41'06", Longitude 91°08'55")  
Flow: 240 gpd  
Discharge Route: directly into Bayou Boeuf

**4. RECEIVING WATERS**

STREAM - Bayou Boeuf

BASIN AND SEGMENT - Terrebonne Basin, Segment 120403

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DESIGNATED USES - a. primary contact recreation  
 b. secondary contact recreation  
 c. propagation of fish and wildlife  
 d. drinking water supply  
 f. agriculture

## 5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit:

1. The limits and monitoring frequencies for Outfalls 001 and 002 have been changed to be more consistent with other similar types of facilities. See Outfall Information.
2. Outfall 003 discharging treated sanitary wastewater has been added to the permit.

## 6. COMPLIANCE HISTORY/COMMENTS

A site visit was conducted at the facility on September 15, 2005. The findings were as follows: (1) the permit was available on-site; (2) the permit expired on October 31, 2004, but a new application was submitted on July 26, 2004; (3) the facility is well kept and neat; (4) there was no discharge at the time of the inspection; (5) a DMR review showed that there were two excursions at the time of the inspection; (6) the facility isn't sending in letters of non-compliance

### DMR Review/Excursions

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
09/06	Oil & Grease	001	0.267 lbs/day	0.14 lbs/day
09/06	BOD	002	5.229 lbs/day	2.12 lbs/day
09/06	Oil & Grease	002	0.234 lbs/day	0.21 lbs/day
07/06	TSS	001	4.712 lbs/day	2.1 lbs/day
07/06	BOD	002	2.575 lbs/day	2.12 lbs/day
07/06	TSS	002	2.877 lbs/day	2.13 lbs/day
06/06	BOD	002	2.97 lbs/day	2.12 lbs/day
05/06	BOD	002	2.54 lbs/day	2.12 lbs/day
04/06	TSS	001	7.32 lbs/day	2.1 lbs/day
04/06	Oil & Grease	001	0.91 lbs/day	0.14 lbs/day
04/06	BOD	002	10.73 lbs/day	2.12 lbs/day
04/06	TSS	002	13.26 lbs/day	2.13 lbs/day
04/06	Oil & Grease	002	0.96 lbs/day	0.21 lbs/day
10/05	TSS	001	2.702 lbs/day	2.1 lbs/day
10/05	BOD	002	2.327 lbs/day	2.12 lbs/day

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10/05	TSS	002	3.278 lbs/day	2.13 lbs/day
7/05	BOD	002	5.059 lbs/day	2.12 lbs/day
7/05	TSS	002	2.252 lbs/day	2.13 lbs/day
5/05	BOD	002	4.894 lbs/day	2.12 lbs/day
05/05	BOD	002	2.342 lbs/day	2.12 lbs/day

## 7. EXISTING EFFLUENT LIMITS

Outfall 001 - brine tank overflow, washwater and compressor cooling water

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow - mgd	Report 1/mo Est.	Report 1/mo Est.
BOD	4.29 lbs/day 1/mo Grab	14.78 lbs/day 1/mo Grab
TSS	0.61 lbs/day 1/mo Grab	2.1 lbs/day 1/mo Grab
Oil & Grease	0.04 lbs/day 1/mo Grab	0.14 lbs/day 1/mo Grab
pH	6.0 - 9.0 s.u. 1/mo Grab	

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Outfall 002 - brine tank overflow and washwater

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow - mgd	Report 1/mo Est.	Report 1/mo Est.
BOD	0.61 lbs/day 1/mo Grab	2.12 lbs/day 1/mo Grab
TSS	0.62 lbs/day 1/mo Grab	2.13 lbs/day 1/mo Grab
Oil & Grease	0.06 lbs/day 1/mo Grab	0.21 lbs/day 1/mo Grab

#### 8. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 120403 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

#### 9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

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#### **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

#### **11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

#### **12. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 0912 are not considered to be associated with industrial activities. Therefore, and SWP3 is not included in the permit.

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**Rationale for ABC Bait Company, Inc.**

1. Outfall 001 -bail water, brine tank overflow, washdown water, and compressor cooling water (estimated flow is 250 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/L)	<u>Reference</u>
Flow	Report:Report	BPJ*
BOD	---:Report	BPJ*
TSS	---:Report	BPJ*
Oil & Grease	---:Report	BPJ*
pH	6.0 - 9.0 s.u.	BPJ*

**Treatment:** none

**Monitoring Frequency:** 1/quarter at the point of discharge from the drain located on the east side of the facility

**\*Limits Justification:** BPJ; Limitations based on discharges from similar seafood packing facilities. The previous limits for this outfall were based on information from the Menhaden Processing Facilities, Development Document; however, menhaden are not processed at this facility. Menhaden are only packaged for bait and shipped from the facility. Therefore, limits more consistent with other similar types of facilities are being placed in the permit.

2. Outfall 002 -bail water, brine tank overflow, and washdown water (estimated flow is 250 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	previous permit
BOD	---:Report	BPJ*
TSS	---:Report	BPJ*
Oil & Grease	---:Report	BPJ*
pH	6.0 - 9.0 s.u.	BPJ*

**Treatment:** none

**Monitoring Frequency:** 1/quarter at the point of discharge from the drain located on the west side of the facility

**\*Limits Justification:** BPJ; Limitations based on discharges from similar seafood packing facilities. The previous limits for this outfall were based on information from the Menhaden Processing Facilities, Development Document;

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however, menhaden are not processed at this facility. Menhaden are only packaged for bait and shipped from the facility. Therefore, limits more consistent with other similar types of facilities are being placed in the permit.

3. Outfall 003 - treated sanitary wastewater (estimated flow is 240 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg. (mg/l)	<u>Reference</u>
Flow	---:Report	
BOD <sub>5</sub>	---:45 mg/L	LPDES General Permit LAG480000 (BPJ)
TSS	---:45 mg/L	LPDES General Permit LAG480000 (BPJ)
Fecal Coliform	---:400/100mL	LPDES General Permit LAG480000 (BPJ)
pH	6.0 -9.0 s.u.	LPDES General Permit LAG480000 (BPJ)

Treatment: sewage treatment plant

Monitoring Frequency: 1/6 months for all parameters at the point of discharge from the sewage treatment plant located on the east side of the facility.

Limits Justification: Light Commercial Facilities General Permit LAG480000, Schedule A.

BPJ Best Professional Judgement  
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL/303(d) WATERBODIES

Subsegment 120403 is listed on LDEQ's Final 2004 303(d) List as impaired for organic enrichment and pH. To date no TMDL's have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Terrebonne Basin, those suspected causes for impairment which are not directly attributed to the bait fish processing point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.



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Therefore, for the purposes of this permit, the organic enrichment and pH impairments will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

Organic Enrichment

To protect against the further impairment of the organic enrichment indicator cause, BOD report limits have been placed on Outfalls 001 and 002 and a limit of 45 mg/L is being placed on Outfall 003.

pH

To protect against the further impairment of the pH indicator cause, pH limits have been placed on all outfalls.